

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	NO. 2:18-CR-65-AJS
	:	
v.	:	JUDGE ARTHUR J. SCHWAB
	:	
OMAR A. ALMUSA,	:	ELECTRONICALLY FILED
	:	
Defendant.	:	UNDER SEAL

MOTION FOR LEAVE TO FILE A DOCUMENT UNDER SEAL

AND NOW comes Defendant, Omar A. Almusa, by and through his attorneys, Patrick A. Casey, Esquire, and Martin A. Dietz, Esquire, and respectfully files the within Motion for Leave to File A Document Under Seal on the following basis:

1. Defendant, Omar A. Almusa (hereinafter, "Dr. Almusa"), was indicted on March 14, 2018 and is charged with violating 21 U.S.C. §§841 (a)(1) and (b)(1)(C), 846 and 18 U.S.C. §1347.

2. On June 27, 2018, Dr. Almusa pled guilty to one count each of 21 U.S.C. § 841(a)(1); 21 U.S.C. § 846; and 18 U.S.C. § 1347.

3. Dr. Almusa was released on a \$10,000 secured bond which requires him to remain in the Western District of Pennsylvania pending disposition of this case unless the Court specifically authorizes his appearance outside this district. As an additional requirement of bond, Dr. Almusa surrendered his United States passport and his Jordanian passport to pretrial services.

4. Dr. Almusa wishes to file a motion to permit travel outside of the Western District of Pennsylvania to Reno, Nevada from August 1 – 5, 2018. Due to the fact that the motion will contain sensitive and personal information about Dr. Almusa that is protected from disclosure under law, it is respectfully requested that he be permitted to file a Motion to Permit Out-of-State Travel under seal.

4. Both Assistant United States Attorney Robert S. Cessar and Supervisory United States Probation Officer Eric Bossert are aware of the circumstances prompting the filing of a Motion to Permit Out-of-State Travel and concur with such a motion.

WHEREFORE, Defendant, Omar A. Almusa, respectfully requests
this Court grant him leave to file a document under seal.

Respectfully submitted,

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Attorneys for Defendant,
Omar A. Almusa

Dated: July 27, 2018

CERTIFICATE OF CONCURRENCE

I, Patrick A. Casey, hereby certify that I sought the concurrence of Assistant United States Attorney Robert S. Cessar in this Motion. Mr. Cessar concurs in the instant request.

/s/ Patrick A. Casey

Date: July 27, 2018

CERTIFICATE OF SERVICE

I, Patrick A. Casey, hereby certify that a true and correct copy of the foregoing Motion for Leave to File a Document Under Seal was served upon the following counsel of record via the Court's ECF system on this 27th day of July 2018:

Robert S. Cessar, Esquire
Assistant United States Attorney
United States Attorney's Office for the
Western District of Pennsylvania
700 Grant Street, Suite 4000
Pittsburgh, PA 15219

/s/ Patrick A. Casey